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I am **OPPOSED** to RM-11828.

I am an Amateur Extra class operator and a Life member of the ARRL. The League has failed in my opinion to demonstrate that the current licensing system is broken to the extent that a need in changing the introductory license class of Technician is needed.

Let me reiterate what this petition for rulemaking would do: **EXPANDING** privileges for Techs necessarily means **DECREASING** the incentives for both General and Extra classes.

At the present time there are 3 ongoing license classes: Technician, General, and Extra. Legacy licenses of Novice and Advanced continue to dwindle in population. Numbers compiled by Joe Speroni AHOA and reported in the ARRL's QST April 2019 put Technicians as nearly 51% of 755,430 U.S. hams. The Technician class grants access to the vast majority of frequency privileges (VHF+). Propagation characteristics tend to be more line-of-sight with the use of more exotic techniques and equipment to get distance similar to HF bands. The majority of activity is probably via FM and digital repeaters with short-range simplex contacts. The Internet in general and the rise of powerful portable computing options such as smartphones and devices such as raspberry pi have created quite attractive options for experimentation and entertainment. Recent trends are moving towards digital hotspots that interact with wifi to give easy access to growing world-wide digital networks.

With all this quickly changing area of technology, it begs the question on the League's assumption that everyone wants to upgrade. Statistics indicate that only half of all licensees actually do upgrade. You can have the "HF experience" without having to do the license upgrade! Quite possibly that's more than enough for some people. If living arrangements are considered in regard to antenna construction, perhaps upgrading isn't viable at all. If one simply needs a license because holding a license is required for putting up an antenna, there isn't necessarily a reason to upgrade.

The ARRL itself reports that license holders are at an all-time high but in its petition the League laments that Amateur Radio just isn't growing fast enough! But granting HF privileges to Techs will solve that problem. The League just simply assumes that worldwide communication via radio is the only game in town... the reality is it isn't. There are also so many varied interests in Amateur Radio that some are hobbies unto themselves. Other than gaining access to HF frequencies, people may look to upgrading to become eligible for shorter and/or specific vanity callsigns.

Or having access to snippets of all parts of the spectrum in the entry level license, people will see no point to upgrading any further, thus backfiring the purpose of this petition!

Writing this response on St. Patrick's Day, this morning on Wires-X room America Link there was an 11-year-old boy with the vanity callsign of W4NWC. In January, Nick Czaikowski tested for Technician, in February he upgraded to General, and in March he obtained his vanity call. Evidently at least his father is a ham who guided him along. He generated quite the pile-up

on the network. I'm reminded of the Lea family with their YouTube channel of hamradio(dot)world.

It's surprising that the League seemingly doesn't understand how the licensing system works! Unbelievably the League says this:

The relative ease or difficulty of the General class license examination is not really relevant to the two issues to be addressed: attracting young newcomers and retaining their interest once they obtain their Technician class license.

Not relevant? What topsy-turvy world does the League live on? Are they trying to say anything logical? Every license testing session I've ever been to, if you pass the Tech, the Volunteer Examiners will PUSH the next test on you! You can go from non-ham to Extra in one sitting! Where is this "experience" building with on-the-air operating? How does the League explain the current holder of W4NWC or the Lea family?

The League attempts to clarify their main point:

The issue is whether or not the entry level license offers newcomers a sufficient incentive to obtain an Amateur license in the first place; and once that entry level license is obtained, whether it provides enough exposure to various facets of the avocation that the newcomer is integrated into the avocation and has an incentive to proceed further...

What is the point of the League's petition? Kids are getting advance licenses such as General class, usually with the help of close and extended ham family members. Test prep is easy enough to Google for... there's an app for that! In their petition, the League says that the Tech test is just too encompassing and it overwhelms kids minds and they lose interest!

Really? Look at petition footnote 13!

The license structure is progressive, you HAVE to take Tech before you move on. You have to learn the boring basics to establish a foundation. Many operators would say the test is only the beginning of the JOURNEY. If you're complaining about the Tech test, it doesn't get any easier going forward.

IF this petition were about merging the General class license into the Technician and having just TWO classes of Tech-General and Extra without removing questions or theory, this might make sense. You'd have two REALLY big tests to trudge through. But this petition isn't offering that solution.

To conclude, I urge the Commission to **REJECT RM-11828**. Many will cite the continued "dumbing-down" of the hobby. THAT is what the ARRL unfortunately is advocating at a time they themselves admit is a time of exploding technological change. Rather than buck up and meet the challenges the world is presenting, they want to go for the easy path.